

EXHIBIT 7

From: [Houghton-Larsen, M Annie](#)
To: [Kenneth Caruso](#); [David Labkowski](#)
Cc: [Gottlieb, Michael](#); [Goverski, Meryl Conant](#); [Nathan, Aaron E.](#); [Sisco, Ciara](#); [Feldman, Betsy L.](#); ["rachel.goodman@protectdemocracy.org"](#); [Brittany Williams](#); [Von DuBose](#)
Subject: Freeman v. Giuliani - Directions for Turnover Per ECF No 94
Date: Monday, November 11, 2024 10:26:35 AM

Counsel,

Per the Court's Order at ECF No. 94, we are providing you with the times and location(s) and delivery instructions to deliver the Receivership property to the Receivers. Please contact us promptly should you have any questions. Please note that the delivery of the physical items must happen at the specific dates and times below to ensure proper access.

1. Deliver the Mercedes-Benz, Model SL500, model year 1980 to the following address on Friday November 15, 2024 at 11:00 AM:

- **Location:** [REDACTED], Hialeah, FL 33010
- **Contact information at storage location:** General Manager, [REDACTED]
[REDACTED]

The Mercedes-Benz must be transported in a manner to ensure the value of the property is protected and preserved. Deliver to Plaintiffs' counsel via email **upon delivery**, a photograph of the Mercedes-Benz, Model SL500, model year 1980 at the storage facility.

2. Deliver any physical property, including the contents of the storage unit in Ronkonkoma, as well as any other physical possession regardless of its current location and separate from the valuables identified in item (3) below, to the following address at the Receivers' storage facility in New York on Friday November 15, 2024 at 9:00 AM:

Location: [REDACTED], Richmond Hill, NY
Contact information at storage location: [REDACTED]

Delivery of all property to [REDACTED], Richmond Hill, NY must be done in a manner to ensure the value of the property is protected and preserved. All property must be appropriately packed and transported with care.

We understand that the receivership property that will be delivered on November 15, 2024 at 9:00 AM at [REDACTED], Richmond Hill, NY at a minimum includes the following items of which we are aware (but may include additional items that Mr. Giuliani possesses but has not yet disclosed):

- Sports memorabilia
- Signed Reggie Jackson picture
- Signed Yankee Stadium picture
- Signed Joe DiMaggio shirt
- Television
- Costume jewelry

- Various items of furniture, including but not limited to the following:
 - Two 3-seat brown upholstered couches (shown in [Zillow listing](#))
 - Two black leather arm chairs (shown in [Zillow listing](#))
 - Two small round wooden coffee tables (shown in [Zillow listing](#))
 - Live-edge wood coffee table (shown in [Zillow listing](#))
 - Small round wood table (shown in [Zillow listing](#))
 - Large mirror (shown in [Zillow listing](#))
 - Two standing lamps (shown in [Zillow listing](#))
 - Two table lamps (shown in [Zillow listing](#))
 - Painting of flowers with gold frame (shown in [Zillow listing](#))
 - Painting of sunset with gold frame (shown in [Zillow listing](#))
 - Small painting with gold frame (shown in [Zillow listing](#))
 - Round oriental rug (shown in [Zillow listing](#))
 - Round wooden table (shown in [Zillow listing](#))
 - Medium mirror (shown in [Zillow listing](#))
 - Painting of coast with silver frame (shown in [Zillow listing](#))
 - Two red upholstered arm chairs (shown in [Zillow listing](#))
 - Two wooden end tables (shown in [Zillow listing](#))
 - Wooden desk (shown in [Zillow listing](#))
 - Brown leather desk chair (shown in [Zillow listing](#))
 - Two lamps (shown in [Zillow listing](#))
 - Bust (shown in [Zillow listing](#))
 - Painting featuring American flag with gold frame (shown in [Zillow listing](#))
 - Painting with thick gold frame (shown in [Zillow listing](#))
 - Artwork in gold frame (shown in [Zillow listing](#))
 - Framed artwork (shown in [Zillow listing](#))
 - Wooden round table (shown in [Zillow listing](#))
 - Four framed paintings (shown in [Zillow listing](#))
 - [Queen size] wooden bed (shown in [Zillow listing](#))
 - Wooden dresser (shown in [Zillow listing](#))
 - Two wood side tables (shown in [Zillow listing](#))
 - Wood dresser (shown in [Zillow listing](#))
 - Wood and black leather lounge chair and ottoman (shown in [Zillow listing](#))
 - Full bed (shown in [Zillow listing](#))
 - Side table (shown in [Zillow listing](#))
 - Dresser (shown in [Zillow listing](#))
 - Pink oriental rug (shown in [Zillow listing](#))

Deliver to Plaintiffs' counsel via email at **9:00 AM November 15, 2024**, a full inventory of all property delivered to [REDACTED], Richmond Hill, NY as well as a description of the condition of the property at the time of delivery.

3. **Deliver any valuables that can fit within a safe deposit box (including but not limited to those items specifically identified below, those items located in Palm Beach, Florida, and any such valuables regardless of current location) to the following address on Friday November 15, 2024**

at 1:00 PM:

Location: [REDACTED] Atlanta, GA 30305, Box # 114

Contact information at storage location: [REDACTED]
[REDACTED]
[REDACTED]

Delivery of all property to [REDACTED] Atlanta, GA 30305, Box # 114 must be done in a manner to ensure the value of the property is protected and preserved. All property must be appropriately packed and transported with care. We understand that the receivership property that will be delivered to the Receivers' agent on November 15, 2024 at 1:00 PM at [REDACTED] [REDACTED] Atlanta, GA 30305, Box # 114, at a minimum includes the following items of which we are aware (but may include additional items that Mr. Giuliani possesses but has not yet disclosed):

- Paper title to the Mercedes-Benz, signed by Mr. Giuliani per <https://www.flhsmv.gov/safety-center/consumer-education/buying-vehicle-florida/buying-private-sale/>
- 2 Bulova Watches
- 5 Shinola Watches
- 1 Tiffany & Co. Watch
- 1 Seiko Watch
- 1 Frank Muller Watch
- 1 Corium Watch
- 1 Rolex Watch
- 2 IWC Watches
- 1 Invicta Watch
- 2 Breitling Watches
- 1 Raymond Weil Watch
- 1 Baume & Mercier Watch
- 6 additional watches
- Costume jewelry
- Diamond ring

Deliver to Plaintiffs' counsel via email at **1:00 PM November 15, 2024**, a full inventory of all property delivered to [REDACTED] Atlanta, GA 30305, Box # 114 as well as a description of the condition of the property at the time of delivery.

4. **Deliver the non-exempt cash held at Citibank, N.A. in account numbers ending in -1428 and -5812 to the following bank account no later than Friday November 15, 2024 at 9:30 AM:**

Bank Name:	Citibank, N.A. – New York, NY
ABA Number:	[REDACTED] 0089
SWIFT Code:	CITIUS33
Credit Account:	[REDACTED] 2464
Credit Account Name:	PBG Concentration Account

Additional Details	
Further Credit Account Number:	2 [REDACTED] 5768
Further Credit Account Name:	Willkie, Freeman, Moss Escrow
Attention:	[REDACTED]-6217 [REDACTED] 7-6392

Provide email confirmation to Plaintiffs' counsel via email as soon as the wire has been executed.

Thank you,
Annie

M.Annie Houghton-Larsen
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Pronouns: she, her, hers